

Response to Consultation of IPART Draft Engagement Charter

November 2020

Introduction

This document outlines Emerald Planet’s (EP) feedback to IPART’s draft Energy Saving Scheme (ESS) Engagement Charter:



Source: *IPART Draft-Engagement-Charter.pdf, ESS Website, November 2020*

EP is a long standing product supplier to all Australian abatement programs (ESS, VEU, EEIS and REES). We are not an AP and do not perform installations. As such, our engagement with IPART primarily relates to the process of product applications.

We welcome the concept of IPART’s charter and accept the documented expectations on ESS stakeholders. It is fair and reasonable for reciprocal expectations between industry and IPART to facilitate a sustainable, positive outcome.

In recognising the potential benefits of the charter, it is important to firstly understand the challenges of the existing system.

Difficult Timeframes for Product Approvals

The current product approval framework has a number of shortcomings, which are summarised below:

1. Unreliability of turnaround time for product approval
2. IPART's unresponsiveness to attempts at communication from business
3. Lack of visibility of the estimated timeframe for assessment of applications

Whilst in many instances, IPART has done a good job of turning around product applications in a matter of weeks, others can take many months or even longer. In the case of the latter, efforts to contact IPART through all available channels (email, phone, web page) rarely receive even a response. This lack of responsiveness has had by far the biggest impact on business, affecting suppliers and ACPs alike:

- Suppliers need to make advance decisions on stock manufacturing. Manufacturing and importation of products takes 12 weeks to complete.
- ACPs need to plan sales and marketing strategies, mobilise and train installation teams.
- Because these decisions require significant commercial investment, none can be made without the assurance of product approval.
 - Even an expected timeframe on product assessments can let businesses make calculated risks

Our suggestion is if IPART were able to nominate, and commit to, a “standard turnaround time” for product approvals (eg up to 30 days), this would go a long way to resolving the uncertainty.

This timeframe can be geared to incentivise applicants to provide accurate and correct paperwork, in a similar way to how the Essential Services Commission (ESC) administer product applications in the Victorian Energy Upgrades (VEU) program. For example:

- >2 RFIs result in an increased “risk” profile for the applicant, and subsequently a longer turnaround time for approval.

It is understood that workload will of course vary, depending on the number of applications in the queue at any one time and the other commitments of IPART staff. This may result in unavoidable delays to approvals.

In these situations, clear communication and responsiveness, as articulated in the draft charter, are vital. Business can typically adapt accordingly, with the right

information. For example they can delay the commencement of marketing strategies or manufacturing cycles without significant cost impact.

We welcome this commitment from IPART in the charter.

Product Nomination System

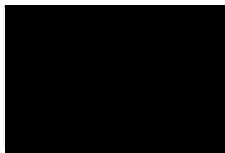
The paper-based product nomination process is cumbersome for participants to use and is an annoyance for ACPs to complete. It means they need to take the time to print, sign, scan and email back the form for every product a supplier needs to get approved.

If the system were electronic, like the VEU's it would be vastly faster and more efficient to use for both scheme participants and IPART alike. We hope this is a feature which IPART is able to consider.

Contact Details

EP thanks IPART for the chance to provide feedback to their proposed charter. We are happy to help with any further detail or clarification on the content of this document, please don't hesitate to contact me.

Regards,



Alex Pawsey

General Manager
Emerald Planet



Commercial in Confidence