

Draft heat pump water heater fact sheets consultation – What we heard

21 November 2023

We thank the stakeholders that provided submissions. We will use the feedback to finalise the fact sheets and update our guidance.

This paper summarises outcomes from our consultation on proposed new Energy Savings Scheme (**ESS**) requirements for Accredited Certificate Providers (**ACPs**) to give customers a heat pump water heater fact sheet before implementation for:

- Activity Definitions D17 and D19 under the Home Energy Efficiency Retrofits (**HEER**) method
- Activity Definitions F16 and F17 under the Installation of High Efficiency Appliances for Business (**IHEAB**) method.

The paper includes a summary of stakeholder submissions and our response.

1 Outcomes

We will update the HEER and IHEAB method guides to set out that the heat pump hot water fact sheet is to be provided to the customer before they agree to have a heat pump water heater installed. As part of explaining the ESS to the customer, the [Minimum Requirements of Conduct](#) requires that an ACP must have a process in place to ensure that they and their representatives provide all relevant fact sheets to the customer before they sign the nomination form and before the installation begins. This requirement will now relate to the provision of heat pump hot water heater fact sheets to customers so they have enough information to ask questions before they agree to have a heat pump water heater installed.

The fact sheet can be provided as a digital or hard copy to suit the customer and ACP's situation. For installations under the HEER method, the HEER Heat Pump Fact Sheet will replace the existing [HEER Fact Sheet](#) for heat pump water heater installations only (that is, for other installations under the HEER method ACPs will still be required to provide customers with the existing HEER Fact Sheet).

2 Next steps

The finalised fact sheets and updated guidance to assist ACPs and auditors will be published on our website. We will ensure that ACPs have sufficient time to get ready to implement the change. We expect to commence the requirement in the first quarter of 2024.

We will tell you when we have published the fact sheets and guidance and confirm the commencement date of the requirements in separate communications.

IPART acknowledges the Traditional Custodians of the lands where we work and live. We pay respect to Elders both past and present. We recognise the unique cultural and spiritual relationship and celebrate the contributions of First Nations peoples.

ACPs can begin providing the fact sheets to their customers before the requirement commences if they wish.

3 Background

Heat pump water heater technology isn't well understood by consumers. This has led to customer complaints that installations are not fit for purpose or don't consider the best solution for the customer. Some of these complaints could be avoided by providing customers with relevant information to help them make informed decisions before the implementation takes place.

We consulted on a proposed requirement to provide a heat pump water heater fact sheet to customers before they agree to have a heat pump water system installed under the HEER and IHEAB methods.

4 Consultation process

We published the draft HEER and IHEAB heat pump water heater fact sheets and a consultation paper on the [ESS website](#) on 15 September 2023 and invited stakeholders to provide written submissions by 6 October 2023 (later extended to 13 October). We also emailed relevant stakeholders seeking submissions. We sought feedback on the:

- content of the fact sheets
- process for providing the fact sheets to customers
- evidence requirements
- impacts for ACPs' businesses.

This consultation is part of our commitment to engaging with our stakeholders by:

- making it easy to engage with us
- consulting with you and being open to feedback
- keeping you informed and being responsive.

5 Consultation feedback

We received 4 written submissions. Submissions from 2 respondents that requested to remain anonymous are published on the [website](#). Two confidential submissions have not been published. Table 1 summarises in general terms the feedback provided and our response. For the confidential submissions the details of the feedback has not been reported in Table 1, but they have been considered.

Table 1 Summary of stakeholder feedback

Question	Summary of stakeholder feedback	IPART response
1. Is there any content you think we should amend or add to the fact sheets?	<ul style="list-style-type: none"> Additional details/clarification should be included in the fact sheets, including information about: <ul style="list-style-type: none"> factors influencing tank size types of heat pumps, energy savings, noise, space, boosters and warranties the amount of the co-payment and installation costs. 	<ul style="list-style-type: none"> We have amended the fact sheets to incorporate feedback from respondents, including content about tank size, energy savings, co-payments.
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)?	<ul style="list-style-type: none"> Respondents were generally supportive of providing the fact sheets to customers in a variety of formats (paper, electronic, via an email or text message) to cover different circumstances including elderly and less technology savvy customers or those receiving the fact sheet at the same time as the sales/installation. 	<ul style="list-style-type: none"> We agree that providing the fact sheet to customers in different formats to suit their circumstances is appropriate. While we will not prescribe the format in which the fact sheet is provided, ACPs (and their installers) should ensure they can provide the fact sheet in a range of formats to meet customer needs.
<p>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:</p> <ul style="list-style-type: none"> 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). 	<ul style="list-style-type: none"> Respondents were generally supportive of providing the fact sheet as part of the first customer interaction or before agreeing to the upgrade. 	<ul style="list-style-type: none"> We will require that ACPs provide the fact sheet to consumers before they sign the nomination form and before the installation begins as this will help customers make informed decisions. ACPs (or their installers) should provide the fact sheet in a format the customer can readily access and allow time for them to read and ask questions before making a decision
4. How much lead time do you need to get your business processes ready to provide customers with the fact sheets?	<ul style="list-style-type: none"> The time it will take respondents to be ready to provide the fact sheet to consumers. ranged from a few days or weeks to a couple of months. 	<ul style="list-style-type: none"> We will ensure that ACPs have sufficient time to get ready to implement the change. This is likely to coincide with the commencement of the ESS Rule. ACPs can begin providing the fact sheets to their customers before the transitional period ends if they wish.
5. What evidence could you provide to show the customer received the fact sheet (e.g. a tick box in the nomination form)?	<ul style="list-style-type: none"> Respondents suggested a range of evidence types to show that the customer received the fact sheet. 	<ul style="list-style-type: none"> We will not specify how an ACP must evidence that a fact sheet has been provided to a customer. In accordance with the Minimum Requirements of Conduct, ACPs will need a process to ensure that the fact sheet is presented to the customer before the customer signs the nomination form and before the upgrade begins. The timing for providing the fact sheet will be set out in the HEER and IHEAB method guides.
	<ul style="list-style-type: none"> Mixed feedback was received on the use of a tick box on the nomination form 	<ul style="list-style-type: none"> We will not require that a tick box be added to the nomination form.

Question	Summary of stakeholder feedback	IPART response
6. Does a requirement to provide customers with the fact sheets have any impacts for your business?	<ul style="list-style-type: none">• Most respondents indicated there would be no material impact for their businesses.	<ul style="list-style-type: none">• Noted.
7. Do you have any other feedback on any aspect of the fact sheets?		<ul style="list-style-type: none">• We have considered additional feedback that was provided on a confidential basis.