




Responses to consultation questions

Would the introduction of an application form for amendments pose any issues or challenges for your business? Please provide details or examples where possible.


 believes it is unlikely to pose any business challenges, unless the form is overly cumbersome and requests information that may not be pertinent, or is covered by the audit process. In Victoria under the VEU scheme, the newly introduced annual reaccreditation process has proven to be drawn out and highly demanding of resources on both ACP and Regulator sides.

It would be helpful to see an example of the form prior to its release for feedback.


Do these proposed information requirements pose any issues or challenges for your business? Is there other information you could provide us to support your application? Please provide details or examples where possible.

No challenges at this stage, it would depend on the detail of the form, as per answer above.

Does the proposal to automatically progress from pre-registration to periodic audit conditions (providing the first audit is satisfactory and there are no compliance issues) raise any issues or challenges for your business? Please provide details or examples where possible.

The proposed changes would not present challenges for  however we hold concerns that a less rigorous audit process in the initial stages of an ACPs 'life-cycle' could introduce risks to the integrity of the scheme. In the long-run, this might have adverse effects on well-established ACPs, Auditors and Ipart staff, where new conditions are introduced due to new ACP's poor behaviour and/or inadequate processes.

The current, slower approach to auditing graduation, while no doubt unpopular, ss a proven success in ensuring scheme integrity and market trust around certificate programs, and sets up new ACPs for long term best-practice behaviour.



[REDACTED]

Are you likely to need to apply for limits higher than 200,000 ESCs or 2,000,000 PRCs? Do you see any challenges or issues with the proposed approach to setting audit conditions for these higher limits? Please provide details or examples where possible.

Yes, [REDACTED] would need to apply for higher certificate limits to support operations, especially as more energy savers engage in the upgrade process. We would stress that only an ACP with a long history of strong compliance at a higher level of certificate creation, should be able to continue to register certificates while under audit i.e.: absolute error rate of <1% per audit.

Any changes that are made, must address the following current examples of the conditions ACPs face whilst in audit:

- Insufficient auditors to meet demand
- Extended auditing timelines as a result of insufficient auditors with capacity to meet our operational requirements
- Difficulty in forecasting our remaining allocation of certificates to support business operations during the audit process
- Uncertainty in audit timeframes creates resourcing challenges, both with people resourcing and financial resourcing i.e.: cash flow
- Timing of audits during peak seasons such as Easter, end of financial year and end of calendar year further compacts all of the above challenges.

Allowing ACPs to continue to register certificates beyond an allocation limit of 200,000 would alleviate the majority of the above challenges for ACPs, auditors and iPart. To maintain an overview of compliance of an ACP we would also suggest that audit cycles should be mandatory once an ACP reaches a registration range of 150,000 - 200,000.

Please do not hesitate to reach out if any of the above requires further clarification or any other questions.

Kind Regards,

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]