



Department for Energy and Mining

Government of South Australia

Dear consultation team,

The Australian Institute of Refrigeration, Air Conditioning and Heating (AIRAH) appreciates the opportunity to provide input on the proposed local demand response requirements for selected appliances, including air conditioners.

AIRAH has operated since 1920 and is the leading specialist membership association for professionals in the heating, ventilation, air conditioning and refrigeration (HVAC&R) industry. This consultation is of great interest to our members and our organisation's vision of safe, sustainable, healthy and effective environments.

AIRAH supports a consistent, national approach to minimum standards. We acknowledge that DR capability requirements have been agreed nationally by Energy Ministers using the GEMS Act 2012. Accordingly, we support the Base Case – Agreed Energy Ministers' timeline and requirements.

The analysis document shows that only around a third of air conditioners currently have DR capability. As the analysis document recognises, large international air conditioning manufacturers are unlikely to develop models to comply with local requirements in a market as small as South Australia; indeed, there is some doubt whether they would do this even for the entire national market.

We believe that introducing DR requirements early in South Australia will restrict the choice of end-users, and may even prevent them from purchasing more energy efficient models – running contrary to the goals of the initiative.

AIRAH notes the challenges faced by the South Australian energy network, and the view that mandatory DR requirements may address some of these issues. Although manufacturers, end-users, and HVAC&R system designers undoubtedly have a role to play in making cooling and heating more sustainable, we do not believe they should carry the burden for structural problems in the energy network – this responsibility lies with the network owner.

Whatever the decision of the South Australian government, AIRAH offers its support to raise awareness of the new requirements and welcomes the opportunity to participate in further consultations.

Regards,

A handwritten signature in black ink, which appears to read "Anthony Gleeson". The signature is written in a cursive, flowing style.

Tony Gleeson, M.AIRAH
Chief Executive
AIRAH